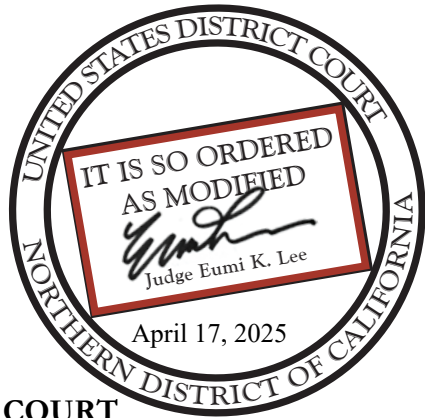


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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ROXANA YANIRA FLORES, an Individual,
Plaintiff,
v.
TARGET CORPORATION, a Minnesota
Corporation; and DOES 1 to 100, Inclusive,
Defendants.

Case No. 5:24-cv-04200-EKL

Judge: Hon. Judge Eumi K Lee

**JOINT STIPULATION TO
CONTINUE MEDIATION
DEADLINE, DESIGNATION OF
EXPERTS, REBUTTAL REPORTS
AND FACT AND EXPERT
DISCOVERY DEADLINES**

In accordance with this District Court's Civil Pretrial & Trial Procedures/Chamber Rules, Plaintiff ROXANA YANIRA FLORES ("Plaintiff") and Defendant/Third-Party Plaintiff TARGET CORPORATION ("Defendant" or "Target"), collectively, by and through their respective attorneys of record, hereby jointly move this District Court for an Order as Modified to Continue All Dates approved by the Honorable Judge Eumi K. Lee's February 4, 2025 Order [Doc. 39]. More specifically, the Parties herein request that the designation of experts, rebuttal reports and close of fact and expert discovery be continued, and that the May 14, 2025, deadline for the initial ADR session be continued to August 14, 2025.

The Parties respectfully submit that good cause exists for an Order granting this Joint Stipulation, as demonstrated by the following:

WHEREAS, on February 4, 2025 the Court granted the Parties up until May 14, 2025 to complete

1 initial ADR session and an extension of 60 days for all of the upcoming court deadlines [Doc. 27].

2 Including:

- 3 a) close of fact discovery from May 1, 2025 to June 30, 2025;
- 4 b) designation of experts from May 30, 2025 to July 29, 2025;
- 5 c) rebuttal reports from June 27, 2025 to August 26, 2025;
- 6 d) close of expert discovery from July 18, 2025 to September 16, 2025;
- 7 e) last day to hear dispositive and Dubert motion hearing, September 17, 2025;
- 8 f) pre-trial conference, November 12, 2025;
- 9 g) jury selection/trial, December 8, 2025.

10 WHEREAS, the Parties have agreed to mediation with Matt Conant, Esq., from ADR Services, Inc.,
 11 on August 5, 2025. This was the earliest available date that worked for the Parties and the mediator.
 12 Previously, the Parties attempted to mediate with Retired Judge Sabraw, but her availability and the Parties'
 13 availability did not align.

14 WHEREAS, Defendant will conduct a Defense Medical Examination on April 30, 2025, at 11:00
 15 a.m. at the office of Youjeong Kim, M.D.

16 WHEREAS, Plaintiff still needs to conduct the deposition of Defendant's Person(s) Most Qualified
 17 (PMQ), and the Parties are continuing to meet and confer regarding the scope of the deposition categories.

18 WHEREAS, the Parties wish to avoid the costs associated with retaining all experts needed for
 19 disclosures and rebuttals, the cost of which could affect the Parties ability to resolve the case.

20 WHEREAS, pursuant to Federal Rule of Civil Procedure Rule 16(b)(4), a schedule may be modified
 21 only for good cause and with the judge's consent.

22 WHEREAS, pursuant to Local Rule 6-2, the parties may file a stipulation, conforming to Civil L.R.
 23 7-12, requesting an order changing time that would affect the date of an event or deadline already fixed by
 24 Court order, or that would accelerate or extend time frames set in the Local Rules or in the Federal Rules.
 25 The stipulated request must be accompanied by a declaration that: 1) sets for with particularly the reasons
 26 for the requested enlargement or shortening of time; 2) discloses all previous time modifications in the case,
 27 whether by stipulations or Court order; and 3) describes the effect the requested time modification would
 28

1 have on the schedule for the case.

2 WHEREAS, after communication with each party in this matter, the Parties have stipulated to the
3 proposed time change of May 14, 2025, deadline to complete initial ADR session to August 14, 2025, and
4 extension for all of the upcoming court deadlines including:

- 5 a) close of fact discovery from June 30, 2025 to September 30, 2025;
- 6 b) designation of experts from July 29, 2025 to October 29, 2024;
- 7 c) rebuttal reports from August 26, 2025 to November 26, 2025;
- 8 d) close of expert discovery from September 16, 2025 to December 15, 2025;
- 9 e) last day to hear dispositive and Dubert motion hearing, ~~December 16, 2025~~; **December 17, 2025**
- 10 f) pre-trial conference, February 12, 2026;
- 11 g) jury selection/trial, March 23, 2026.

12 WHEREAS, there are no Court-established litigation deadlines occurring within the seven days
13 following the submission of this proposed joint-stipulation.

14 WHEREAS, this proposed joint-stipulation does not create an unreasonable delay in this matter,
15 and a denial of this proposed joint-stipulation would cause undue prejudice to Defendant by not providing
16 sufficient time to investigate and defend the claims alleged by Plaintiff.

17 NOW, THEREFORE, based on the foregoing recitals, the Parties hereby stipulate as follows and
18 request that the District Court grant the proposed Order to continue the May 14, 2025, deadline for
19 completing the initial ADR session, designating experts, submitting rebuttal reports, and completing fact
20 and expert discovery, as set forth in the February 4, 2025, Order to Continue All Dates, subject to the
21 Court's docket.
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23
24 **The further case management conference is continued from June 11, 2025 to August 27, 2025.**
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5 Dated: 4/15/2025

THE LAW OFFICE OF DAVID F. GARCIA, APC

6
7 By: /s/ David F. Garcia
8 Attorneys for Plaintiff

9 Dated: 4/15/2025

VOGL MEREDITH BURKE & STREZA LLP

10
11 By: /s/ Emily Fowler
12 Emily Fowler
13 Attorneys for Defendant
14 TARGET CORPORATION
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